



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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FEB 25 2015

Ref: 8EPR-N

Scott Fitzwilliams, Forest Supervisor
White River National Forest
c/o Roger Poirier, Project Leader
120 Midland Avenue, Ste. 140
Glenwood Springs, CO 81601

Re: Breckenridge Ski Resort Multi-Season Recreation Projects
Draft Environmental Impact Statement, CEQ #20150014

Dear Mr. Fitzwilliams:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service (USFS) January 2015 Draft Environmental Impact Statement (EIS) for the Breckenridge Ski Resort (BSR) Multi-Season Recreation Projects. Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

Background

The project area is located in the White River National Forest adjacent to the town of Breckenridge in Summit County, Colorado. With the proposed action, BSR is interested in complementing current available activities with a broader range of summer recreational opportunities.

Alternatives identified in the Draft EIS include the following:

- Alternative 1 (No Action);
- Alternative 2 (Proposed Action) includes numerous elements such as Vista Haus and Independence SuperChair summit site year-round use (i.e., expanded to summer use); addition of two zip lines, two canopy tours, and two challenge courses; 15 miles of new mountain bike trails; 1.5 miles of new hiking trails; expanded off-highway vehicle (OHV) tours; realignment or rehabilitation of access roads; Vista Haus facility expansion; and expanded chairlift operations in the summer season, i.e., three additional chairlifts would be added to the existing chairlifts operating in the summer season (bringing the total in summer operation to six); and
- Alternative 3 was developed in response to potential wildlife, high alpine ecosystem and scenery impacts. Therefore, while it includes many of the elements of Alternative 2, some elements were eliminated or altered to address potential impacts. For example, Alternative 3 would add only one zip line; an alternative canopy tour; reduce mileage for new mountain bike and hiking trails,

reduce OHV routes, and add only one additional chairlift to the existing chairlifts operating in summer (total summer operation would be four).

The USFS has not identified a Preferred Alternative. We appreciated the opportunity to provide scoping comments for this project with our March 13, 2014 letter. Our remaining recommendations are intended to further inform the decision to be made and the public's understanding of potential impacts to public health and the environment. Based on our review of the Draft EIS, the EPA's comments and recommendations focus on the following issues: (1) visitation and traffic estimates, (2) water resources, including wetlands, and (3) documentation of the U.S. Fish and Wildlife Service recommendations. These issues serve as the basis for the EPA's EC-1 rating discussed at the conclusion of this letter.

(1) Visitation and Traffic Estimates

Assumptions: The Draft EIS relies on an assumption that 90% of summer guests would already be coming to Breckenridge regardless of new recreational opportunities, while only 10% of summer guests would be new visitors that were attracted due to the recreational opportunities developed under this project. There is no justification provided for the selection of these percentages, making it difficult to determine if these are reasonable assumptions. However, these assumptions are critically important for accurately portraying the resource impacts associated with increased visitation and traffic. More daily visitors and vehicle trips could potentially result in more impacts to air, water and wildlife resources.

Based on the 10% assumption noted above, the Draft EIS indicates that anticipated new, additional visitors would total 12,500-15,000 over the 90-day summer season, depending on the alternative, or approximately 150 new visitors per day in the summer. The Draft EIS indicates that these new visitors would have a fairly minimal impact on traffic (with an increase of approximately 100 daily additional vehicles, two-directions, on Highway 9), and existing parking facilities would be adequate.

Given that annual BSR summer visits are expected to increase from the existing 3-month summer total of 175,000 to an estimated 300,000-325,000, depending on the alternative, we note that resource impacts would be significantly higher if the underlying assumption regarding new, additional summer visitors is higher than predicted. We recommend that the Final EIS explain the rationale for assuming that only 10% of summer guests would be new visitors. If the 10% new visitors estimate can be appropriately referenced and documented in the Final EIS, then we do not have additional concerns with the traffic projections and related impacts.

If upon further review it is determined that the 10% estimate was low and a notably higher assumption is instead included in the Final EIS, then the affected traffic calculations and related impacts would need to be revisited. In any case, we recommend that the USFS consult with the Colorado Department of Transportation regarding the operations of Highway 9, including whether there is a need to review Level of Service impacts to affected intersections in Breckenridge and to determine if congestion mitigation measures are warranted.

Mitigation: To reduce resource impacts that could be associated with increased visitation and traffic, we recommend consideration of the following additional mitigation measures:

- Limit the number of tickets available during traditional summer peak travel days;
- Expand the BSR “Free Ride” bus service area to address the expected increase in summer use;
- Require reduced fee and/or free shuttle services for recreationists and workers; and
- Require extensive promotion of shuttle services, including regularly scheduled service to/from Denver and local area airports and lodging.

(2) Water Resources, Including Wetlands

Wetlands: Impacts to the types and functions of wetlands in mountain environments are difficult or impossible to mitigate due to shorter growing seasons and low night time temperatures. We support the USFS’s Watershed Conservation Practices Handbook (WCPH) management measures and the Project Design Criteria (PDCs) identified for the protection of watersheds and wetlands in the project area. In particular, we note the requirements that wetlands be clearly marked and avoided and all water crossings be bridged or constructed with boardwalks set on diamond pier foundations to ensure that no permanent impacts to wetlands would result from project activities. Given that 16.2 acres of wetlands were mapped in the project area, the majority of which are in good condition, we recommend expanding the PDCs to include a requirement for a biologist to be onsite during construction activities to ensure that even temporary impacts to wetlands are avoided to the greatest extent possible.

Watersheds: Given that watersheds in the area, e.g., French Gulch and Blue River, have been heavily impacted by historic mining activities, it is particularly important to control erosion that may be associated with construction and implementation of project activities. Such efforts are necessary in order to maintain suitable water quality and habitat availability for aquatic life within the larger-scale watershed and ecosystem. To ensure the long-term viability of area ecosystems and recreational uses that depend on aquatic communities, we support the Draft EIS’s WCPH management measures and PDCs to maintain ground cover, control sediment, and protect soil.

Alpine and tundra areas are particularly sensitive to disturbance. The extremely short growing season and thin soils often impair the success of vegetation restoration efforts leaving soils exposed to erosional forces. Therefore, since Alternative 2 includes more alpine surface disturbance than Alternative 3, we recommend developing a specific PDC for sediment control in sensitive alpine areas if Alternative 2 is ultimately selected as the Preferred Alternative.

To provide a baseline for future monitoring of impacts and evaluating of potential influence on downstream water quality, we recommend the Final EIS provide a summary of available water quality monitoring data for the project area. Parameters of interest for the area include heavy metals, total suspended solids, total dissolved solids, and nutrients. Nutrients are of particular interest given that State regulations are in place to control nutrient loading to the Blue River and Dillon Reservoir, which are downstream of the project area. Identification of any significant gaps in data also would be a valuable addition to the Final EIS and may be helpful in developing the project monitoring plan.

(3) Documentation of the U.S. Fish and Wildlife Service’s Recommendations

The Draft EIS identifies the Canada lynx, an Endangered Species Act-listed threatened species, as likely

to be adversely affected by the proposed project. Alternative 2 would result in a loss of 13 acres of lynx habitat, would contribute to existing reduced habitat connectivity, and would result in extension of the human activity zone (i.e., disruptive visual and noise presence) beyond the existing summer operational area. Alternative 3 would result in a loss of 11 acres of lynx habitat, but would not contribute to reduced habitat connectivity or extend summer activities outside the existing summer operational area.

We recognize that the USFS will discuss these determinations and findings with the U.S. Fish and Wildlife Service (USFWS). Documentation of the USFWS's consultation and recommendations for PDCs, mitigation, and monitoring will be a valuable addition to the Final EIS.

The EPA's Rating

Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, the EPA is rating the Draft EIS as "Environmental Concerns – Adequate Information" (EC-1). The "EC" rating means that the EPA's review has identified potential impacts that should be avoided in order to fully protect the environment. The "1" rating means that the Draft EIS adequately sets forth the environmental impacts of the project alternatives. A description of the EPA's rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

We appreciate the opportunity to comment on this document and hope our suggestions will assist you with preparation of the Final EIS. Please contact us if additional explanation of these comments would be helpful. You can reach me at 303-312-6704, or your staff may contact Amy Platt at 303-312-6449 or by email at platt.amy@epa.gov.

Sincerely,



Philip S. Strobel
Acting Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation